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Bethlehem, Pa. 18018
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Darlene L. Heller, Director of Planning and Zoning
Tracy Samuelson, Assistant Director of Planning and Zoning
City of Bethlehem
10 E. Church Street
Bethlehem, PA 18018

July 30, 2020

Dear Ms. Heller and Ms. Samuelson,

We appreciate the chance to comment on the proposal for 1355 Easton Road Phase 2.

The proposed development is adjacent to the East Branch of the Saucon Creek, hence we are concerned about protecting the Creek from parking lot run-off. The City's comment letter states that the number of parking spaces (109) exceeds the required amount (79) by almost 38%. We recommend reducing the number of spaces to the mandated amount because run-off from parking lots contain contaminants and the lots absorb heat, causing temperatures to rise. We suggest the use of permeable pavement and the incorporation of green spaces to slow and filter stormwater runoff and mitigate the heat island effect.

Comments by the Public Works Forestry Department state that there is a "shortfall of required landscaping" and the need for two additional trees. In light of increasing temperatures, our expectations and hopes are that the developer would go beyond the minimum tree replacement and landscaping requirements and serve as a model for other developments in the City. Additional trees could be planted in the parking lot and landscaping buffers could be established between the property and the adjacent wildlife corridor along the neighboring Saucon Creek.

Regarding the building, has the developer assessed energy efficiency measures beyond the building code, such as passive solar design features, advanced lighting controls, high efficiency HVAC equipment, increased insulation and advanced air sealing techniques to reduce infiltration?

In addition, has the developer considered including solar panels or constructing the building with adequate structural rooftop capacity and electrical rough-ins so that solar could easily be added at a later date? Northampton County recently adopted the Commercial Property Assessed Clean Energy (C-PACE) program. C-PACE is an innovative financial tool that allows financing for

solar, increased energy efficiency and water conservation projects to be attached to the property instead of the owner. This can free up developers' finances by placing the assessment on the property and structuring repayment through property taxes.

New construction projects provide opportunities to employ ambitious energy saving strategies that will lower the business' energy costs, while at the same time reduce pollution from traditional energy sources, helping to preserve our environment and maintain the health of our citizens.

As Bethlehem City is in the midst of creating a Climate Action Plan to reduce our carbon footprint, increase our sustainability and utilize alternative energy sources, let us be mindful of these goals as they pertain to new development.

Thank you for your consideration.

Sincerely,

Lynn Rothman

Lynn Rothman, Chair

On behalf of the Bethlehem EAC:

Elizabeth Behrend

Elisabeth Cichonski

Ben Felzer

Ben Guthrie

Brian Nicas

Mike Topping

cc: Bethlehem City Council

Mayor Donchez